REMARKS

Summary of the Office Action

Claims 1-20 stand rejected under U.S.C. §103(a) as being unpatentable over Reber (US, 6,138,151) in view of Bhattacharjya et al. (US, 6,456393).

Summary of Response to the Office Action

Applicant amends independent claims 1, 7, 10, and 18 and dependent claims 2 and 11 to further define the invention and adds new claims 21-24. Accordingly, claims 1-24 are presently pending for consideration.

All Claims Define Allowable Subject Matter

Claims 1-20 stand rejected under U.S.C. §103(a) as being unpatentable over Reber (US, 6,138,151) in view of Bhattacharjya et al. (US, 6,456393). Applicant respectfully traverses the rejections on grounds that it fails to set forth a prima facie case of obviousness.

Independent claims 1 and 18, as amended, both recite an image processing apparatus including, in part, "an embedding data generation part that generates coupling information from the hyperdocument data to specify related information related to an image element" and "the related information is represented by an absolute path or is represented by a relative path with reference positional information." Similarly, independent claim 7, as amended, recites an image forming medium including, in part, "the related information is represented by an absolute path or is represented by a relative path with reference positional information." Furthermore, independent claim 10, as amended, recites an image forming method including, in part, "generating coupling information from the hyperdocument data to specify related information related to an image element" and "the related information is represented by an absolute path or is represented by a relative path with reference positional information." Applicant respectfully

submits that at least these features of amended independent claims 1, 7, 10, and 18 are neither taught nor suggested by <u>Reber</u> and <u>Bhattacharjya et al.</u>, whether taken singly or combined.

The Office Action on page 2, paragraph 4 alleges that <u>Reber</u> discloses an image processing apparatus (figure 1) comprising an input part (figure 1, element 44) that inputs hyperdocument data (col. 5, lines 21-28) and coupling information (col. 5, lines 11-13) to specify related information related to an image element constituting a document image (col. 5, lines 14-17). Applicant respectfully disagrees.

In contrast to the Applicant's claimed invention Reber teaches (col. 5, lines 11-24, and FIG. 3) that the network access apparatus 33 communicates a portion of the printed code to a computer 56 via the electronic network 10. Reber further teaches that it is preferred that the portion of the printed code be equivalent for each of the printed codes 24, 26, and 30 associated with the printed publication 12. In addition, Reber teaches that the computer 56 receives the portion of the printed code, matches the portion to one ore more records in the database 54, and returns a plurality of electronic addresses associated with the publication. However, Reber is completely silent about the method of directly accessing the destination by the printed codes bypassing the need to visit the publication 12.

Applicant respectfully submits that the method of navigating an electronic network taught by Reber using the printed codes appears to implement a multiple stage navigating paths, which are defined by the multi-portion printed codes. Specifically, the method appears to require using the portion of printed codes to visit the publication 12 first, thereafter, the remaining portion of the printed codes navigates the electronic network to reach the destination. On the other hand, Applicant's claimed invention is already implemented with the single "absolute path" to reach the destination. Applicant respectfully submits that since the "related information" recited in

amended independent claims 1, 7, 10, and 18 is represented by an absolute path or a relative path with reference positional information that directly access the destination, such features do not require identifying the "electronic address associated with the publication" as taught by <u>Reber</u>.

Accordingly, Applicants respectfully asserts that <u>Reber</u> and <u>Bhattacharjya et al.</u>, whether taken singly or combined, fails to teach or suggest the fail to teach or suggest at least the features recited in the amended independent claims 1, 7, 10, and 18. Furthermore, Applicant respectfully asserts that <u>Bhattacharjya et al.</u> does not cure the deficiencies of <u>Reber</u>. Thus, in light of the arguments presented above, Applicant respectfully asserts that rejection under 35 U.S.C. §103(a) should be withdrawn because <u>Reber</u> and <u>Bhattacharjya et al.</u>, whether taken individually or in combination, neither teach nor suggest the novel combination of features recited in amended independent claims 1, 7, 10, and 18, and hence dependent claims 2-6, 8-9, 11-16, and 19-20.

New Claims 21-24

Applicant has added new claims 21-24. Applicant respectfully submits that new claims 21-24 further define the subject matter of the current invention. Thus, Applicant respectfully requests consideration of newly added claims 21-24.

CONCLUSION

In view of the foregoing remarks, Applicant respectfully requests reconsideration of this application, withdrawal of all rejections, and the timely allowance of all pending claims. Should the Examiner feel that there are any issues outstanding after consideration of this response, the Examiner is invited to contact Applicant's undersigned representative to expedite prosecution.

If there are any other fees due in connection with the filing of this response, please charge the fees to our Deposit Account No. 50-0310.

If a fee is required for an extension of time under 37 C.R.R. § 1.136 not accounted for above, such an extension is requested and the fee should also be charged to our Deposit Account.

Respectfully submitted,

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